

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

SUSAN LARSEN-HEISE,

Plaintiff,

Case No: 14-14711

Hon. Gershwin A. Drain

Magistrate Judge Whalen

-VS-

TARGET CORPORATION,

Defendant.

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**STIPULATION AND ORDER REGARDING PLAINTIFF'S EXPERTS**

NOW COME the Parties, by and through their respective counsel, and with respect to Defendant's pending Motion to Strike Expert Witnesses or in the Alternative to Compel Discovery [Case Doc #21], hereby stipulate and agree as follows:

1. Plaintiff will not offer the testimony of the following expert witnesses listed by plaintiff in her Witness List dated June 9, 2015, [Case Doc #17] at the trial of this matter in any form:<sup>1</sup>

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s. Robert B. Forney, Jr., Ph.D, DABFT – Expert – Toxicologist – 8825 West Bancroft, Toledo, Ohio 43617

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<sup>1</sup> The letter identification of each expert witness is from the Plaintiff's Witness List, Case Doc # 17.

t. Ronald T. Smolarski, M.A., CRC – Expert – Economist – 114 Felch, Ann Arbor, MI 48103

u. Mike Ciaramitaro & Jim Pouliot – Expert – Accident Reconstruction – 27247 Pembroke, Warren, MI 48092

v. Richard Toner – Expert – Accident Reconstruction – 4879 Hardwoods Dr., West Bloomfield, MI 48323

w. George W. Hickes, P.E. – Expert – Ingenium Engineering Services, Petersburg, Michigan

x. Robert Pachella – Expert – Human Factors – 525 E. University, Ann Arbor, Michigan

y. Gary J. McDonald – Expert – Magnetic North Consulting Services, Grand Rapids, Michigan

z. Clarence L. Nicodemus, Ph.D., P.E. – Expert – Bioforce, East Lansing, Michigan

aa. Dr. Saami J. Shaibani – Expert – Physicist and Injury Mechanism Analysis, 115 Winding Way Road, Lynchburg, Virginia

bb. Lorna Middendorf, E.D. – Expert – Human Factors – 311 Northshore Drive, P.O. Box 94, St. Clair Shores, Michigan

cc. Curtis G. Caterer – Expert – Accident Reconstruction – Lake States Investigations, 9309 Holly Road, Grand Blanc, Michigan

dd. Marisuz Ziejewski, Ph.D. – Expert – Biomechanical Engineer – MZ Engineering, 2363 20th Avenue South, Fargo, North Dakota

ee.<sup>2</sup>

ff. Paul Gross – Expert – Meteorology – 550 W. Lafayette Blvd., Detroit, Michigan 48226

gg. Dr. Robert Ancell – Expert – Vocational Rehabilitation - 23077 Greenfield, #185, Advanced Building, Southfield, MI 48075

hh. William D. King – Expert – Economics - 6512 Centurion Drive, Lansing, MI 48917.

ii. Nitin Paraniye – Expert – Economics - Thompson Econometrics and Employment Research, 2350 Franklin Road, Suite 200, Bloomfield Hills, Michigan, 48302

jj. James D. Madden – Expert – Safety Analysis and Accident Reconstruction – 10175 Brecksville, Deerview Building, Cleveland, OH 44141

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<sup>2</sup> The listing of Dr. Paul Cullis is omitted from this stipulation as he was retained by defendant and has provided his report already.

2. Plaintiff will provide the report, disclosure of amounts paid to and testimony list under Rule 26 of the following expert to defendant within 28 days of entry of the order below and make the expert available for deposition within a reasonable time thereafter, with defendant to pay the reasonable fee for such deposition:

kk. Kirk Lee – Expert- Life Care, 8335 River Road, Cottreville, MI 48039.

3. Defendant will withdraw the pending Motion to Strike Expert Witnesses or in the Alternative to Compel Discovery [Case Doc #21].

By:   /s/ Jennifer G. Damico \_\_\_\_\_  
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By:   /s/ Mark D. Willmarth \_\_\_\_\_  
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**ORDER REGARDING PLAINTIFF'S EXPERTS**

THE COURT, upon the reading and filing of the foregoing stipulation of the parties and being advised in the premises;

NOW THEREFORE, IT IS SO ORDERED.

/s/R. Steven Whalen

R. STEVEN WHALEN

UNITED STATES MAGISTRATE JUDGE

Dated: September 30, 2015September 30, 2015